## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

RALPH S. JANVEY, in his capacity as	§
court-appointed receiver for the Stanford	§
receivership estate; the OFFICIAL STANFORD	§
INVESTORS COMMITTEE; SANDRA	§
DORRELL; SAMUEL TROICE; and	§
MICHOACAN TRUST; individually and on	§
behalf of a class of all others similarly situated,	§
	§
Plaintiffs.	§ CIVIL ACTION NO. 3:12-cv-04641-N
	§
vs.	§
	§
GREENBERG TRAURIG, LLP;	§
HUNTON & WILLIAMS LLP; and	§
YOLANDA SUAREZ,	§
	§
Defendants.	§

## AGREED MOTION BY HUNTON & WILLIAMS LLP FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION FOR JUDGMENT ON THE PLEADINGS

Defendant Hunton & Williams LLP ("Hunton") hereby respectfully moves the Court for an order extending the time in which Hunton must reply in support of its motion for judgment on the pleadings by 14 days, up to and including September 2, 2016. In support of this motion, which is agreed between the involved parties, Hunton states as follows:

- 1. On July 15, 2016, Hunton filed its Motion for Judgment on the Pleadings on Claims by Non-Clients and Supporting Memorandum of Law ("Motion") [ECF 207].
- 2. On August 5, 2016, Ralph Janvey, in his capacity as receiver for the Stanford receivership estate, the Official Stanford Investors Committee ("OSIC"), and a putative class of

investors in products sold by entities that Robert Allen Stanford owned or controlled (collectively, "Plaintiffs") filed their response [ECF 214].

- 3. Accordingly, under Local Rule 7.1(f), Hunton's reply in support of its Motion is currently due August 19, 2016.
- 4. Given pre-planned vacation schedules of Hunton's representatives in this litigation and the commitments of Hunton's counsel, Hunton requires additional time to complete and file its reply. Accordingly, Hunton seeks an order extending the time in which it must file its reply by 14 days, up to and including September 2, 2016.
- 5. On August 12, 2016, one of Hunton's attorneys, Jeff Colman, conferred by email with Ed Snyder, an attorney for Plaintiffs in this matter, concerning Hunton's request for an extension of time to reply in support of its Motion. Mr. Snyder indicated that Plaintiffs agree to Hunton's requested 14-day extension of time.

WHEREFORE, Hunton respectfully requests an order extending the time in which Hunton must reply in support of its Motion by 14 days.

Date: August 15, 2016

Richard A. Sayles (Tex. # 17697500) Shawn Long (Tex. # 24047859) SAYLES WERBNER 4400 Renaissance Tower 1201 Elm Street Dallas, Texas 75270 dsayles@swtriallaw.com (214) 939-8701

Counsel for Hunton & Williams LLP

(214) 939-8787 (Facsimile)

Respectfully submitted,

By: s/ Jeffrey D. Colman
Jeffrey D. Colman (Ill. # 0491160)

David Jiménez-Ekman (Ill. # 6210519)

April A. Otterberg (Ill. # 6290396)

JENNER & BLOCK LLP

353 N. Clark Street

Chicago, IL 60654-3456

icolman@jenner.com

(312) 923-2940

(312) 840-7340 (Facsimile)

Counsel for Hunton & Williams LLP Admitted Pro Hac Vice

## **CERTIFICATE OF CONFERENCE**

I hereby certify that on August 12, 2016, and on behalf of Hunton & Williams LLP, I conferred by email with counsel for Plaintiffs, Edward Snyder, concerning Hunton's request for an extension of time to file a reply in support of its Motion for Judgment on the Pleadings on Claims by Non-Clients and Supporting Memorandum of Law ("Motion"). As reflected in paragraph 5 of this motion, Mr. Snyder indicated that Plaintiffs agree to Hunton's requested 14-day extension of time, to and including September 2, 2016, to file a reply in support of its Motion.

s/ Jeffrey D. Colman
JEFFREY D. COLMAN

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2016, a copy of the foregoing **Agreed Motion by Hunton & Williams LLP for Extension of Time to File Reply In Support of Motion for Judgment on the Pleadings** was served on all counsel of record in the above-captioned matter in accordance with the Federal Rules of Civil Procedure.

s/ Jeffrey D. Colman
JEFFREY D. COLMAN